

DCUSA DCP 440 Change Declaration 2

Voting end date: 5pm, 12 June 2025

DCP 440	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	CVA REGISTRANT	GAS SUPPLIER
CHANGE SOLUTION	Accept	Accept	Accept	n/a	n/a
IMPLEMENTATION DATE	Accept	Accept	Accept	n/a	n/a
RECOMMENDATION	<p>Change Solution – Accept.</p> <p>In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the change solution was more than 50% in all Categories.</p> <p>Implementation Date – Accept.</p> <p>In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the implementation date was more than 50% in all Categories.</p>				
PART ONE / PART TWO	Part One – Authority Determination Required				

PARTY	SOLUTION (A / R)	IMPLEMENTATION DATE (A / R)	WHICH DCUSA OBJECTIVE(S) IS BETTER FACILITATED?	COMMENTS
DNO PARTIES				
Northern Powergrid (Northeast) plc	Reject	Reject	We believe that charging objective 6 is negatively impacted as this solution introduces complexities into DUoS billing, which we believe are unnecessary.	<p>We agree there is an issue but do not agree that this is the correct solution. We believe that rather than introducing complexities into DUoS billing, where some de-energised MPANs are charged and some are not, it would be more beneficial for the existing obligations on Suppliers, to correct the status of sites that are de-energised but have actual advancing reads, to be tightened or refined so that these are resolved more quickly. The compliance audits performed by Elexon on Suppliers should also be reviewed to ensure they are effective.</p> <p>We believe that the current verbiage of the DCUSA is suitable for dealing with de-energised sites, as it says “If a site is found to be energised charges will be back dated to the date of energisation.” This means that the volumes will be charged UoS charges once the energisation status has been corrected, which should ensure that the UoS charges are recovered.</p> <p>In analysis of our own data we have identified of the MPANs which are de-energised but have actual advancing meter reads around 75%-80% are de-energised for 7 days or less and 88% are de-energised for less than one month. In addition, ~3% of such MPANs in each area are responsible for 85%-90% of the total volumes, with the remaining 97% of such MPANs only responsible for 10%-15% of the total volumes. We believe that the obligations on Suppliers should be strengthened such that these MPANs with high volumes or which are de-energised for longer periods are corrected sooner, which would</p>
Northern Powergrid (Yorkshire) plc	Reject	Reject		

				<p>resolve the issue without having to change the way DUoS billing works.</p> <p>In addition, the working group identified that a consequential change is needed to the P402 obligation in the BSC. It is our belief that if this change were to be approved then the consequential change to the P402 obligation would need to be implemented at the same time as this change.</p>
Eastern Power Networks Plc	Accept	Accept	<p>We believe that DCUSA Charging Objective 3 is better facilitated by this change as it will ensure that a customer is charged for what they use in all cases, rather than some parties avoiding paying DUoS charges. It also creates consistency with NHH DUoS charges, and with Settlements.</p>	<p>At the current time, where a customer is flagged as “de-energised” but is actually consuming energy, they do not pay any DUoS charges unless the supplier changes the energisation status retrospectively (the backstop time period of 14 months will be reduced by 70% following MHHS, which will instead adopt a fix-forward approach for most standing data).</p> <p>This is inconsistent with the approach taken by settlement, which we understand settles all measured consumption immediately.</p> <p>The data gathered by the working group indicates that correcting the energisation status does not always happen or does not happen in a timely manner, even though retrospective application is currently available.</p> <p>Some suppliers have cited process or code issues and said they don’t have any formally documented obligations in this area, while others have said those concerns are not barriers for ensuring the energisation status is correct.</p> <p>It is clear that there is energy being consumed that is not being paid for (or at least the DUoS is not being recovered by the distributor from the responsible customer).</p> <p>In their send back letter, Ofgem expressed concerns about customers not being aware of their incorrect energisation status and of the sudden impact to them of charges being applied.</p>
London Power Networks Plc	Accept	Accept		
South Eastern Power Networks	Accept	Accept		

				<p>This change will remove any material retrospective application of charges and hence will remove any sudden surprises for customers. Moreover, those customers will know they are consuming energy (they don't need to be aware that their energisation status is incorrect to know this) and so should expect to be charged for it. Compare this current non-charging arrangement with theft situations, where the ombudsman has been of the view that "ultimately, consumers are expected to pay for the energy that they use" and has stated "its therefore not unreasonable to suggest that as the person responsible for the property and associated utilities, you were responsible to query as to why no notification of electricity charges had been issued". With all of the industry's focus on theft, it's not clear why we would be content to continue to give it away to these customers.</p>
National Grid Electricity Distribution South West	Accept	Accept	3 – billing & pass-through charges will be more accurate and will align with the aggregated/NHHSC market	None
National Grid Electricity Distribution South Wales	Accept	Accept		
National Grid Electricity Distribution East Midlands	Accept	Accept		
National Grid Electricity Distribution West Midlands	Accept	Accept		

SP Distribution plc	Accept	Accept	We consider Charging Objectives 3 better facilitates this change:	None
SP Manweb plc	Accept	Accept	That compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business.	
Southern Electric Power Distribution plc	Accept	Accept	We believe that this change better facilitates DCUSA Objective 3	None
Scottish Hydro Electric Power Distribution plc	Accept	Accept		

IDNO PARTIES				
INDEPENDENT DISTRIBUTION CONNECTION SPECIALISTS LIMITED	Accept	Accept	IDCSL agrees with the Working Group that Charging Objective 3 is better facilitated.	None
INDIGO POWER LIMITED	Accept	Accept	DCUSA Objective 3	None at this time
THE ELECTRICITY NETWORK COMPANY LIMITED	Accept	Accept	We agree with the Proposer and workgroup's view that Charging Objective 3 is better facilitated.	None

SUPPLIER PARTIES				
SSE Energy Supply Ltd (SSE Business Energy)	Reject	Reject	We agree with the objectives listed	None

EDF ENERGY CUSTOMERS LIMITED	Accept	Accept	3. That compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business	None
British Gas	Accept	Accept	<p>We agree that charging objective 3 is better facilitated as this change ensures that specific usage is charged for and creates consistency with NHH DUoS charges and with Settlements.</p> <p>We also believe that charging objective 2 is better facilitated due to suppliers having appropriate/different processes in place to identify where Non-Zero consumption has been received on a De-Energised MPAN meaning they can charge customers correctly.</p>	
CVA REGISTRANT PARTIES				
No Votes				
GAS SUPPLIER PARTIES				
Not Eligible				